

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

PAUL J. MANAFORT, JR.,

Defendant.

Case No. 17-cr-201-1-ABJ

**CONSENT MOTION FOR ORDER RELEASING SEIZED
OR ENCUMBERED PROPERTY:
1046 N. EDGEWOOD STREET, ARLINGTON, VIRGINIA 22201
AND SCHWAB ACCOUNT XXXX7988**

The United States of America, by and through its undersigned counsel, respectfully submits this motion for an Order directing release of the following assets:

1. The real property and premises commonly known as 1046 N. Edgewood Street, Arlington, Virginia 22201, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto.
2. All funds held in account number XXXX7988 at Charles A. Schwab & Co., Inc., and any property traceable thereto.

As set forth in the proposed order attached hereto, these assets were alleged for forfeiture in the September 13, 2018 Superseding Information. Cr. Dkt. No. 419 at ¶ 69. These assets have been seized or encumbered as described in the proposed order.

Under the plea agreement, the defendant consented to the forfeiture of two other properties in lieu of these assets. Cr. Dkt. No. 422 ¶ 12(a)(4) and (5). In accordance with the plea agreement and as set forth in the attached proposed order, the United States requests the entry of the proposed order on the terms set forth therein.

The United States has conferred with counsel for Andrea Manafort Shand and Christopher Shand, who have executed the proposed order and consent to its entry as an order of the Court.

Respectfully submitted,

JESSIE K. LIU
United States Attorney

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